

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PASS BOX, LLC, SYNERGY)
NATURAL RESOURCES, LLC,)
DREW LOFSTAD and BRIAN)
COCHRUM)
Plaintiffs,)
v.)
) Civil Action File No. 1:14-cv-01164-TWT
PASS BOX PARTNERS, LLC,)
PORTARE SERVICES, LLC,)
WORLD MORTGAGE EXCHANGE)
GROUP, INC., GOLDENROD, LLC,)
RISING EAGLE, LLC, RONALD)
REESER, THEODORE J. WEYN, JR.,)
LARRY S. KING, TRACY BILLINGS)
and KEN MINCHEW,)
Defendants.)

MOTION FOR IMMEDIATE INJUNCTIVE RELIEF AND DECLARATORY
JUDGEMENT

Portare Services LLC ("Portare") moves the Court for:

A. Entry of temporary and preliminary injunctive relief in the form of an Order that Plaintiffs Pass Box, LLC, Synergy Natural Resources, LLC, Drew Lofstad and Brian Cochrum and anyone acting in concert with them, or any of them, including but not limited to Pass Box Global Corp. be enjoined and

restrained from transporting, concealing, modifying, defacing, or taking or asserting possession custody or control over or with respect to 3 container storage shipping boxes manufactured by Pinnacle Manufacturing, LLC of Boaz, Alabama, more particularly described as follows:

1. One Bulk Pneumatic Box storage unit having dimensions of 20' x 20' x 8' and weighing about 10,000 lbs. and bearing Pinnacle Mfg. LLC serial number I-106 (herein "Unit 106");
2. One Bulk Pneumatic Box storage unit having dimensions of 20' x 20' x 8' and weighing about 10,000 lbs. and bearing Pinnacle Mfg. LLC serial number I-108 (herein "Unit 108"); and
3. One Bulk Pneumatic Box storage unit having dimensions of 20' x 20' x 8' and weighing about 10,000 lbs. and bearing Pinnacle Mfg. LLC serial number I-109 (herein "Unit 109). Photos of such units are annexed hereto as Portare Exhibits 001 -008.

B. Entry of declaratory judgment that it is entitled to, and it have, possession of the above described Units 106, 108 and 109.

The factual and legal bases for this motion are set forth in the Memorandum in Support of Motion for Immediate Injunctive Relief and

Declaratory Judgment filed even date herewith.

Respectfully submitted, this 8th day of September 2014

Attorney for Portare Services LLC

/S/ *James G. Killough*

James G. Killough Ga Bar # 417900

Law Offices
333 Sandy Springs Circle
Suite 160
Sandy Springs, Georgia 30328
404 467 8700
Fax 866 692 1634
jim@killoughlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I am counsel for Defendant Portare Services LLC and this day, I electronically filed the foregoing pleading with the clerk's office CM/ECF system, which will send email notification to the following counsel of record:

Joshua Tropper
jtrotter@bakerdonelson.com
Steven R. Press
spress@bakerdonelson.com
William M. Osterbrock
wosterbrock@bakerdonelson.com
Attorneys for Plaintiffs

And further certify that the foregoing has been prepared with one of the font and point selections approved by the court in LR 5.1B, Book Antiqua 13.

Respectfully submitted, this 8th day of September 2014

s/ James G. Killough

James G. Killough